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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

JAMES RICHARDSON,
Plaintiff,
v.
GERALD W. ROSE,
Defendant.

Case No. 3:22-CV-00265-MMD-CSD

**Stipulation and Order for Extension
of Time
(First Request)**

Plaintiff James Richardson and Defendant Gerald W. Rose hereby stipulate and agree: 1) Defendant may have a 23-day extension of time, from August 29, 2022 to September 21, 2022, to respond to Plaintiff's Motion to Remand, and 2) Plaintiff may have a 5-day extension of time, from September 28, 2022 to October 3, 2022 to file a reply in support of his motion to remand.

The extensions are warranted for four reasons. First, defense counsel's office has lost a number of attorneys and staff. As a result, defense counsel is handling a higher-than-normal caseload. Second, only a limited number of attorneys and support staff work in defense counsel's office at any given time due to the pandemic, thereby slowing the time it takes to process and complete required tasks. Third, defense counsel's calendar has been busier than normal with multiple filing deadlines in several cases, including two before the

Ninth Circuit. Fourth, Plaintiff's counsel has a busy schedule as well and he too is facing multiple deadlines in other cases. Under the circumstances, good cause exists to extend the deadline for Defendant to file his response to Plaintiff's Motion to Remand and for Plaintiff to file his reply. *See* Fed. R. Civ. P. 6(b)(1)(A) ("When an act may or must be done within a specified time, the court may, *for good cause*, extend the time...with or without motion or notice if the court acts, or if a request is made, before the original time or its extension expires[.]") (emphasis added).

This is the first request for an extension of time by either party regarding Plaintiff's Motion to Remand. *See* LR IA 6-1(a) (must advise of previous extensions). The parties have contacted each other and neither opposes the other's extension request. This stipulation is made in good faith and not for the purpose of undue delay.

Respectfully submitted this 23rd day of August, 2022.

RUSBY LAW, PLLC

JASON M. FRIERSON
United States Attorney

s/ Christopher Rusby
CHRISTOPHER RUSBY
Attorney for Plaintiff

s/ Holly A. Vance
HOLLY A. VANCE
Attorney for Defendant

s/ Richard Carnell Baker
RICHARD CARNELL BAKER
(Pro Hac Vice)
Counsel for Plaintiff, James Richardson

IT IS SO ORDERED.

Dated: August 23, 2022.



UNITED STATES DISTRICT JUDGE